

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
REVERSE MORTGAGE INVESTMENT	)	Case No. 22-11225 (MFW)
TRUST INC., <i>et al.</i> , <sup>1</sup>	)	
	)	(Jointly Administered)
	)	
Debtors.	)	<b>Hearing Date: April 27, 2023 at 10:30 a.m. (ET)</b>
	)	<b>Objection Deadline: April 20, 2023 at 4:00 p.m. (ET)</b>
	)	

**NOTICE OF (I) HEARING TO CONSIDER  
FINAL APPROVAL OF THE DISCLOSURE STATEMENT  
AND CONFIRMATION OF THE JOINT CHAPTER 11 PLAN  
OF LIQUIDATION FOR REVERSE MORTGAGE INVESTMENT TRUST  
AND ITS DEBTOR SUBSIDIARIES AND (II) RELATED  
VOTING AND OBJECTION DEADLINES**

**PLEASE TAKE NOTICE** that on March 22, 2023, the United States Bankruptcy Court for the District of Delaware entered an order [Docket No. 575] (the “Solicitation Procedures Order”): (a) conditionally approving the *Disclosure Statement for the Joint Chapter 11 Plan of Liquidation for Reverse Mortgage Investment Trust and its Debtor Subsidiaries* [Docket No. 577] (including all exhibits thereto and as may be amended, supplemented, or modified from time to time, the “Disclosure Statement”), (b) approving the solicitation and voting procedures with respect to the proposed *Joint Chapter 11 Plan of Liquidation of Reverse Mortgage Investment Trust and its Debtor Subsidiaries* [Docket No. 576] (as may be amended, modified, amended, or supplemented from time to time, the “Plan”); (c) approving the solicitation materials and documents to be included in the solicitation packages (the “Solicitation Package”); and (d) approving procedures for soliciting, receiving, and tabulating votes on the Plan and for filing objections to the Plan.

**PLEASE TAKE FURTHER NOTICE** that the hearing at which the Court will consider final approval of the Disclosure Statement and Confirmation of the Plan (the “Confirmation Hearing”) will commence on **April 27, 2023 at 10:30 a.m. prevailing Eastern Time**, before the Honorable Mary F. Walrath, United States Bankruptcy Judge, via Zoom or at the Court, 824 North Market Street, 5th Floor, Courtroom No. 4, Wilmington, Delaware 19801.

<sup>1</sup> The Debtors in these jointly administered chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Reverse Mortgage Investment Trust Inc. (3421); Reverse Mortgage Funding LLC (0209); RMIT Cash Management LLC (6241); RMIT Operating I LLC (1844); and RMIT Operating II LLC (2301). The location of the Debtors' service address for purposes of these chapter 11 cases is: 1455 Broad Street, 2nd Floor, Bloomfield, NJ 07003.

**PLEASE BE ADVISED:** THE CONFIRMATION HEARING MAY BE CONTINUED FROM TIME TO TIME BY THE COURT OR THE DEBTORS **WITHOUT FURTHER NOTICE** OTHER THAN BY SUCH ADJOURNMENT BEING ANNOUNCED IN OPEN COURT OR BY A NOTICE OF ADJOURNMENT FILED WITH THE COURT AND SERVED ON ALL PARTIES ENTITLED TO NOTICE.

**CRITICAL INFORMATION REGARDING VOTING ON THE PLAN**

**Voting Record Date.** The voting record date was **March 21, 2023** (the “**Voting Record Date**”), which is the date for determining which Holders of Claims in Classes 3, 4, 5, 6, 7, 8, and 9 are entitled to vote on the Plan.

**Voting Deadline.** The deadline for voting on the Plan is on **April 20, 2023 at 4:00 p.m. prevailing Eastern Time** (the “**Voting Deadline**”). If you received a Solicitation Package, including a Ballot, and intend to vote on the Plan, you **must**: (a) follow the instructions carefully; (b) complete **all** of the required information on the Ballot; and (c) execute and return your completed Ballot according to and as set forth in detail in the voting instructions so that it is **actually received** by the Debtors’ voting and solicitation agent, Kroll Restructuring Administration LLC (“**Kroll**” or the “**Voting Agent**”), on or before the Voting Deadline. **A failure to follow such instructions may disqualify your vote.**

**CRITICAL INFORMATION REGARDING OBJECTING TO THE PLAN**

**ARTICLE IX** OF THE PLAN CONTAINS RELEASE, EXCULPATION, AND INJUNCTION PROVISIONS. THUS, YOU ARE ADVISED TO REVIEW AND CONSIDER THE PLAN CAREFULLY BECAUSE YOUR RIGHTS MIGHT BE AFFECTED THEREUNDER.

**Objection Deadline.** The deadline for filing objections to final approval of the Disclosure Statement and/or the Plan is **April 20, 2023 at 4:00 p.m. prevailing Eastern Time** (the “**Objection Deadline**”). All objections to the relief sought at the Confirmation Hearing **must**: (a) be in writing; (b) conform to the Bankruptcy Rules, the Local Rules, and any orders of the Court; (c) state with particularity the legal and factual basis for the objection and, if practicable, a proposed modification to the Plan (or related materials) that would resolve such objection; **and** (d) be filed with the Court (contemporaneously with a proof of service) and served upon the following parties so as to be **actually received** on or before the Objection Deadline:

Debtors	Creditors' Committee
<p><b>Reverse Mortgage Investment Trust</b> 1455 Broad Street 2nd Floor, Bloomfield, NJ 07003 Attn: Richard Jensen</p> <p>With a copy to:</p> <p><b>Sidley Austin LLP</b> 787 Seventh Avenue New York, New York 10019 Attn: Anthony Grossi and Patrick Venter</p> <p>- and -</p> <p><b>Benesch, Friedlander, Coplan &amp; Aronoff LLP</b> 1313 North Market Street, Suite 1201 Wilmington, DE 19801 Attn: Michael J. Barrie, Jennifer R. Hoover, and John C. Gentile</p>	<p><b>Thompson Coburn Hahn &amp; Hessen LLP</b> 488 Madison Avenue New York, NY 10022 Attn: Mark S. Indelicato, Mark T. Power, and Joseph Orbach</p> <p>- and -</p> <p><b>Blank Rome</b> 1201 Market Street, Suite 800 Wilmington, DE 19801 Attn: Regina Stango Kelbon and Josef W. Mintz</p>

### **ADDITIONAL INFORMATION**

**Obtaining Solicitation Materials.** The materials in the Solicitation Package are intended to be self-explanatory. If you should have any questions or if you would like to obtain additional solicitation materials (or paper copies of solicitation materials if you received electronic access to the solicitation materials), free of charge, please feel free to contact the Debtors' Voting Agent, by: (a) writing to Reverse Mortgage Investment Trust Inc. Ballot Processing Center, c/o Kroll Restructuring Administration LLC, 850 3rd Avenue, Suite 412 Brooklyn, NY 11232; (b) calling the Debtors' restructuring hotline at (888) 511-5072 (toll-free within the United States or Canada) or (646) 440-4157 (if outside the United States or Canada); (c) emailing RMITinfo@ra.kroll.com (with "RMIT Solicitation" in the subject line); or (d) visiting the Debtors' restructuring website at <https://cases.ra.kroll.com/RMIT>. You may also obtain copies of any pleadings filed in these chapter 11 cases for a fee via PACER at: <https://www.deb.uscourts.gov/>. Please be advised that the Voting Agent is authorized to answer any questions about, and provide additional copies of, solicitation materials, but may **not** advise you as to whether you should vote to accept or reject the Plan.

**The Plan Supplement.** The Debtors will file the Plan Supplement (as defined in the Plan) on or before **April 13, 2023**, and will serve notice on all Holders of Claims entitled to vote on the Plan, which will: (a) inform parties that the Debtors filed the Plan Supplement; (b) list the information contained in the Plan Supplement; and (c) explain how parties may obtain copies of the Plan Supplement.

**Notice of the Assumption or Rejection of Executory Contracts.** Under the terms of Article V of the Plan, on the Effective Date, except as otherwise provided in the Plan or in the Confirmation Order, each Executory Contract and Unexpired Lease shall be deemed automatically rejected by the applicable Debtor as of the Effective Date other than those contracts and leases that are identified on the Assumed Executory Contracts and Unexpired Leases Schedule.

**BINDING NATURE OF THE PLAN:**

**IF CONFIRMED, THE PLAN SHALL BIND ALL HOLDERS OF CLAIMS AND INTERESTS TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, WHETHER OR NOT SUCH HOLDER WILL RECEIVE OR RETAIN ANY PROPERTY OR INTEREST IN PROPERTY UNDER THE PLAN, HAS FILED A PROOF OF CLAIM IN THE CHAPTER 11 CASES OR FAILED TO VOTE TO ACCEPT OR REJECT THE PLAN OR VOTED TO REJECT THE PLAN.**

*[Remainder of page intentionally blank]*

Dated: March 22, 2023  
Wilmington, Delaware

**BENESCH, FRIEDLANDER, COPLAN  
& ARONOFF LLP**

/s/ Jennifer R. Hoover

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